

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

M CORP DBA 11:59,

Plaintiff,

$$\mathbf{V}_i$$

Case No.: 1:24-cv-1823

**INFINITIVE, INC.,
JOSEPH BRADLEY SHERIDAN,
and
DOES 1 – 25, INCLUSIVE**

Defendants.

**DECLARATION IN SUPPORT OF
MEMORANDUM IN OPPOSITION TO ORDER TO SHOW CAUSE
AND MOTION FOR TEMPORARY INJUNCTION**

I, Yiorgos L. Koliopoulos, do hereby depose and state as follows:

1. I am an attorney with the law firm of Williams Mullen. I submit this declaration in support of Defendant's Joint Memorandum in Opposition to Plaintiff's Motion for Temporary Restraining Order ("Opposition Brief"). I am familiar with the facts set forth herein.
2. On October 3, 2024, Mr. Sheridan engaged Williams Mullen as his counsel in connection with the allegations raised by Mr. Sheridan's former employer, 11:59, which are at issue in the above-captioned lawsuit. That same day, my colleague, Micah Schwartz, notified 11:59's counsel that Williams Mullen would be representing Mr. Sheridan.
3. On October 8, 2024, Mr. Schwartz and I discussed the issues raised by 11:59 with its counsel, Stacy Landau and Kegan Andeskie with the law firm of Nukk-Freeman & Cerra, P.C. We told Mr. Andeski and Ms. Landau that a draft declaration from Mr. Sheridan would be forthcoming. I explained that the purpose of providing an unexecuted draft declaration



was so that 11:59 could redline and/or comment on the declaration so the parties could attempt to resolve any issues that 11:59 felt could be addressed through a declaration by Mr. Sheridan.

4. On October 11, 2024, I emailed 11:59's counsel the foregoing draft declaration, as well as copies of the Google To Do List and the Google Contact List referenced in Defendant's Opposition Brief. Among other things, the draft declaration stated that Mr. Sheridan wished to receive authorization to delete 11:59's files from his Google Drive account.
5. On October 14, 2024, my firm provided through iManageShare, password protected zip files containing an electronic copy of a folder titled "11:59" located within Mr. Sheridan's personal Google Drive account, which included the Google Contact List referenced in the Opposition Brief, as well as the Google To Do List referenced in the Opposition Brief, which was saved as "First Day" in Mr. Sheridan's Google Drive account.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 28, 2024


Yiorgos L. Koliopoulos